



U.S. Department of Justice

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November 18, 2017

Michael Schmiede
Law Offices of Michael P. Schmiede, P.C.
53 W Jackson Blvd #1515
Chicago, IL 60604

Re: ***United States v. Allen Young, No. 17 CR 82***

Dear Mr. Schmiede:

Pursuant to Rule 16(a)(1)(G) of the Federal Rules of Criminal Procedure, the government hereby notifies you that, at trial, the government intends to present expert testimony, as detailed below.

A. FBI Special Agent Joseph Raschke

The government anticipates calling FBI Special Agent Joseph Raschke to testify regarding historical cell site analysis he performed to determine the location of cellular phone towers associated with cellular telephones used by Allen Young and minor K.B. during June 2016. Enclosed with this letter is a summary, in chart form, of Special Agent Raschke's expected testimony. Please note that the maps and charts provided by Special Agent Raschke are not final trial exhibits. The actual exhibit(s) we will offer at trial will be produced to you prior to trial; this is intended merely to put you on notice regarding the substance of Agent Raschke's testimony. The telephone data supporting Special Agent Raschke's analysis has previously been provided during the course of discovery.

The government anticipates that Special Agent Raschke's testimony will include statements about how cell phone towers operate. Specifically, the government anticipates that Special Agent Raschke will testify about the cell towers to which the cellular telephones assigned telephone numbers 773-771-0391 (Verizon), 312-447-4048 (Sprint), and 773-953-9379 (Sprint) were connected at certain times during June 2016. Special Agent Raschke will opine on the general areas in which the aforementioned cellular telephones were located on specific dates and at specific times in June 2016, based upon the cell towers to which they were connected. Neither the Verizon nor the Sprint records contain cell site information for text messages or

data transactions, so Special Agent Raschke's analysis was limited to the cellular towers utilized by these cellular telephones for voice call activity.

A copy of Special Agent Raschke's curriculum vitae is enclosed with this letter. Please be advised that Special Agent Raschke has testified as an expert witness in other federal and state trials.

B. FBI Special Agent Carrie Landau

The government anticipates calling FBI Special Agent Carrie Landau to testify regarding sex trafficking, including about (1) typical means sex traffickers use to target, recruit, manipulate, and maintain victims; (2) contributing factors that can make victims more susceptible to influence by sex traffickers; (3) common other information about the subculture of sex trafficking, including the meaning of certain terms and the use of websites such as backpage.com; and (4) common dynamics between sex traffickers and their victims and between the multiple victims that may be working for a sex trafficker at a given time.

Special Agent Landau has investigated sex trafficking offenses involving minors since 2005, including serving as the Crimes Against Children Coordinator of the Chicago Division of the FBI from 2009 to 2015. Special Agent Landau has interviewed over 500 victims of sex trafficking, at least 100 of whom were juveniles when trafficked; interviewed approximately 50 suspected sex traffickers regarding their involvement in prostitution; and assisted or led approximately 120 sex trafficking investigations, including undercover operations. To date, Special Agent Landau has received over 300 hours of training and instruction in the investigation of crimes against children and the sex trafficking of minors and adults from state and federal agencies including the Las Vegas Metropolitan Police Department, the U.S. Department of Justice, and the FBI. She also provides training and education to other law enforcement officers, social service agencies, health care workers, parents, and school staff on violent crimes against children and sex trafficking.

Based on her training and experience investigating cases involving sex trafficking, the government anticipates that Special Agent Landau will testify about specialized language used in the pimp/prostitute subculture, including certain code words employed by those who engage in prostitution or who solicit sexual acts in exchange for money. Special Agent Landau will testify about the business of prostitution and how it has changed due to technological advances, including the now-common use of internet websites like Backpage.com and the use of cell phones to solicit and arrange prostitution activities.

Based on her training, her experience interviewing victims and perpetrators of sex trafficking, and her experience conducting investigations, the government anticipates that Special Agent Landau further will testify about the types of adult

and minor females who commonly are recruited by pimps to participate in prostitution: females who lack familial support or otherwise feel unloved and unwanted, are in need of money or housing (or both), are addicted to or frequently use drugs and alcohol, who have previously been a victim of crimes, and/or who suffer from mental illness or severe body image issues. She also will opine on common methods used by pimps to target and recruit vulnerable victims and control them thereafter. Methods commonly used to recruit prostitutes include providing housing, food, affection and/or attention to make victims feel special and understood—a process referred to as “grooming”—before raising the topic of prostitution. The methods used to control females once they are involved in prostitution are similar and can include, depending on the preference of the pimp and the perceived weakness(es) of the individuals he prostituting: providing or withholding affection, love and romance; using older women to watch over and train new recruits; surveilling and monitoring them; and threatening or making them feel fearful that others would find out they were engaging in prostitution if they stop.

Finally, the government anticipates that Special Agent Landau will testify about common reactions by victims of sex trafficking, including victims’ tendencies to become compliant with their pimps (including living with him and/or having sex with him), to feel shame and embarrassment about their conduct, and to blame themselves for the circumstances in which they are found. Many victims continue to express love and/or loyalty toward their pimp and continue contact with their pimp even after removed from the situation. Some victims facilitate the prostitution of other victims. Most victims minimize the number or extent of prostitution acts in which they engaged due to feelings of shame and embarrassment. Others express fear of their pimp, but typically that occurs only after the victim has been removed from the pimp’s custody or care and feels safe from his grasp. And some victims express concern about being prosecuted themselves due to their participation in illegal conduct. For any/all of these reasons, victims of sex trafficking may not be completely forthcoming when questioned by law enforcement.

A copy of Special Agent Landau’s curriculum vitae is enclosed with this letter. Please be advised that Special Agent Landau has testified as an expert witness in federal court.

If you have any questions about any of the above or where to find the items of discovery referenced herein, please do not hesitate to call me.

Very truly yours,

JOEL R. LEVIN
Acting United States Attorney

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